



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

*In re: Terrorist Attacks on September 11, 2001* \* Case No.: 03-md-1570 (MDL)  
\* (GBD) (SN)

This document relates to:

*Marie Laure Anaya, et alii, vs. Islamic Republic of Iran (1:18-cv-12341) (GBD) (SN)*

***DONNA M. HALL'S DECLARATION OF FAMILIAL RELATIONSHIP***

I, Donna M. Hall, hereby declare under penalty of perjury, as provided for by 28 U.S.C., § 1746, that the following statements are true and correct, namely:

1. My name is Donna M. Hall, and I am the widow of Richard Bradway Hall, an insurance executive who died on 11 September 2001, while at work, when the World Trade Center collapsed. I submit respectfully this Declaration for the purpose of demonstrating that Richard Bradway Hall was the functional equivalent of the father of my daughter, Kathleen Marie Delatizky (née Holster).

2. While Richard Bradway Hall was not the biological father of my daughter, Kathleen Marie Delatizky, , for the reasons set forth below, Richard Bradway Hall should be deemed the functional equivalent of the father of my daughter.

3. My daughter, Kathleen Marie Delatizky, was born in Jersey City, New Jersey, in 1982, as Kathleen Marie Holster. She is my only child.

4. Kathleen Marie Delatizky's biological father is my former husband, Stuart Holster. In or about 1984, when Kathleen was about two and a half years old, Stuart Holster and I separated, and she no longer lived with him, although Stuart Holster did continue to have visitation with Kathleen every Wednesday evening and every other weekend throughout her childhood. The legal dissolution of my marriage to Stuart Holster was ultimately finalized in or about 1987.

5. I started dating Richard Bradway Hall in or about 1990, when Kathleen was 7 years old. Right from the outset of our relationship, he was very good to Kathleen and to me; as stated by Kathleen in her Declaration to this Honorable Court, Richard was very considerate towards both of us and brought much fun and levity into our lives.

6. Richard Bradway Hall and I were married, in Lyndhurst, New Jersey, on 15 December 1991, two weeks before Kathleen's ninth birthday, and my daughter was present at that blessed event.

7. I have read *KATHLEEN MARIE DELATIZKY'S DECLARATION OF FAMILIAL RELATIONSHIP*, executed by her on 31 August 2023, which I understand is being submitted to this Honorable Court, in tandem with this Declaration, am familiar with the facts referenced in her said declaration and vouch for the truth and accuracy of all of the factual averments contained in her said declaration.

8. Further to Kathleen's representation in her said declaration about Richard's having purchased our family home in Purchase, New York, because of that community's strong public school system, Richard also persuaded me to take a year off from outside employment to help Kathleen to adapt to her changing schools in the middle of third grade. Although I then went back to work part-time in a local real estate office, and was receiving \$450 per month in child support throughout Kathleen's childhood, Richard was the primary breadwinner of the household and gave Kathleen and me a good life, including annual summer holidays with Richard's parents on Cape Cod.

9. I concur wholeheartedly with Kathleen's sentiment, expressed in a number of ways in her said declaration, that my late husband, Richard Bradway Hall, was a loving, caring and supportive stepfather, such that he was indeed the functional equivalent of her father.

I, Donna M. Hall, undersigned, hereby declare, under the penalty of perjury, that  
the foregoing is accurate, true and correct.

Dated: 9/1/23

  
DONNA M. HALL